

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
	§	(Jointly Administered)
Post-Effective Date Debtors.¹	§	

**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR’S SIXTH OMNIBUS
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF
THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS**
(Related Docket Nos. 2259)

The undersigned hereby certifies as follows:

1. On November 24, 2021, the *Plan Administrator’s Sixth Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims (Satisfied Claims)* [Docket No. 2259] (the “Sixth Omnibus Objection”) was filed with the Court by the administrator of the chapter 11 plan of the above-captioned reorganized debtors (the “Plan Administrator”). The deadline for parties to file a response to the Sixth Omnibus Objection was December 24, 2021 (the “Response Deadline”).

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

2. After the filing of the Sixth Omnibus Objection, counsel for the Plan Administrator received certain informal comments to the proposed order approving the Sixth Omnibus Objection, which informal comments were addressed and resolved by agreement. In addition, certain claimants withdrew claims initially subject to the Sixth Omnibus Objection.

3. Attached hereto as **Exhibit 1** is an amended proposed form of order (the “**Revised Proposed Order**”) which resolves all known informal comments received by the Plan Administrator regarding the Sixth Omnibus Objection and no formal responses were filed on the Court’s Docket prior to the Objection Deadline. A redline reflecting changes from the proposed form of order filed with the Sixth Omnibus Objection to the Revised Proposed Order is attached hereto as **Exhibit 2**.

Dated: December 30, 2021

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner, Esq.

(TX Bar No. 00792304)

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Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of December, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner, Esq.